

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
In re

Chapter 11

Seacrest Equities, LLC

Case no. 16-43956

Debtor.

-----X

**NOTICE OF HEARING ON APPLICATION FOR FINAL COMPENSATION**

PLEASE TAKE NOTICE, that a hearing will be held before the Honorable Carla E. Craig at the United States Bankruptcy Court, United States Bankruptcy Court, United States Bankruptcy Court, Conrad B Duberstein Courthouse, 271-C Cadman Plaza East, Brooklyn, NY 11201, on November 15, 2017 at 2:00 p.m., or as soon thereafter as counsel can be heard, to consider the request for (a) final compensation of Backenroth Frankel & Krinsky, LLP, counsel to the Debtor, for \$46,612 in fees, plus disbursements of \$-0- for a total of \$46,612, and that the Debtor pay that amount, less the \$14,390 pre-petition retainer, leaving a net amount to be paid of \$32,222.

PLEASE TAKE FURTHER NOTICE, that objections shall be filed with the Clerk of the Bankruptcy Court, , United States Bankruptcy Court, United States Bankruptcy Court, Conrad B Duberstein Courthouse, 271-C Cadman Plaza East, Brooklyn, NY 11201, and served upon the undersigned and the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, NY 10014; so as to be received at least seven days prior to the hearing date.

PLEASE TAKE FURTHER NOTICE, that the fee application is available upon request of the undersigned, and may also be obtained on the Bankruptcy Court's internet site: [www.nyeb.uscourts.gov](http://www.nyeb.uscourts.gov).

Dated: New York, New York  
October 4, 2017

BACKENROTH FRANKEL & KRINSKY, LLP  
Attorneys for the Debtor

By: s/Mark A. Frankel  
800 Third Avenue  
New York, New York 10022  
(212) 593-1100

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----X

In re

Chapter 11

Seacrest Equities, LLC

Case no. 16-43956

Debtor.

-----X

**SUMMARY SHEET: BACKENROTH FRANKEL & KRINSKY, LLP**

Interim Fees Sought	Interim Fees Awarded	Interim Expenses Sought	Interim Expenses Awarded	Fees Sought in this Application	Expenses Sought in this Application
-0-	-0-	-0-	-0-	\$46,612	\$-0-

Name of Professional	Year of Bar Admission	Hours Billed	Hourly Rate	Blended Hourly Rate
Mark A. Frankel	1984	92.3	\$505	\$505

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
In re

Chapter 11

Seacrest Equities, LLC

Case no. 16-43956

Debtor.  
-----X

**FINAL APPLICATION FOR ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES OF BACKENROTH FRANKEL &  
KRINSKY, LLP, PURSUANT TO SECTION 330 OF THE BANKRUPTCY  
CODE**

Backenroth Frankel & Krinsky, LLP ("BFK" or "Applicant"), attorneys for Seacrest Equities, LLC (the "Debtor"), as and for its final application for allowance of compensation and reimbursement of expenses for the period of September 1, 2016 through August 22, 2017, under §330 of the Bankruptcy code, respectfully represents as follows:

**APPLICATION**

1. On September 1, 2016, the Debtor filed a Chapter 11 petition under Title 11 of the United States Code, 11 U.S.C. 101 et seq. (the "Bankruptcy Code").
2. As of the filing date, the Debtor owns the real property at 12 Seacrest Drive Huntington, New York (the "Property").
3. The Property was encumbered by \$4,333,429 of liens and judgments. Based upon a pre-petition appraisal, the property value was \$1,500,000.
4. The Property was in foreclosure at that time, but the judgment of foreclosure was stayed due to alleged defects in the in the foreclosure process. Resolution of the foreclosure disputes had dragged on for almost a year with no end in sight. In the meantime,

interest was accruing, property taxes were accruing, carrying costs needed to be covered, and the Property condition was deteriorating.

5. Under New York law, the Property could not be sold in foreclosure until these issues are resolved.

6. Under the Bankruptcy Code, however, the Property could be sold first and distribution of the proceeds determined next.

7. The Debtor filed this case together with a Plan shortly thereafter, and scheduled a sale under the Plan.

8. The Debtor retained MYC & Associates, Inc. as real estate broker.

9. The Plan provided for a carve-out for administration, priority and unsecured claims, and for the disputed sale proceeds to be placed in escrow, with the rights of the competing mortgagees to the proceeds to be determined by the Suffolk County Supreme Court, which has jurisdiction over the Chase foreclosure action.

10. On November 14, 2016, the Bankruptcy Court entered an order approving the Debtor's Disclosure Statement. Sale of the property under the plan

11. As of June 7, 2017, the Debtor received a \$1,700,000 offer from Michael Poon to purchase the Property under the Plan. Dr. Poon then lowered his offer to \$1,600,000, but ultimately, he increased the offer back to \$1,700,000 on the eve of the sale and confirmation hearing, to convince the mortgagees not to credit bid.

12. In the meantime, the mortgagees – Grasmere and Chase – formalized the terms for the post-confirmation determination of their claims, which terms were incorporated in the confirmation order.

13. General Unsecured Claims totaled \$1,191,529 including under-secured lien claims. But the insider unsecured creditors waived their claims, totaling about \$750,000. The mortgagees subsequently agreed to increase the distribution fund to \$72,385, which equates to an approximate 20% distribution to general unsecured creditors.

14. Since the sale proceeds are insufficient to pay all creditors in full, the Debtor's members were entitled to no distribution.

15. In addition, the Plan provides for payment of administration fees. The undersigned agreed to a limited \$30,000 carve-out.

16. Besides drafting the pleadings, attending court hearings, and negotiating with the landlord and the Debtor's insiders to accomplish the results set forth above, BFK assisted the Debtor in fulfilling its obligations under the Bankruptcy Code including the retention of counsel, opening new bank accounts, obtaining a bar date, filing operating reports, attending status conferences, making and responding to motions, coordinating adjournments of hearings, preparing for and attending meetings with the United States Trustee, and responding to general creditor inquiries.

17. For BFK to fulfill its responsibilities to the Debtor and its creditors, it was necessary for BFK to expend \$46,612 in time charges and \$-0- in disbursements, for a total of \$46,612 calculated as follows:

Name of Professional	Year of Bar Admission	Hours Billed	Hourly Rate	Total
Mark A. Frankel	1984	92.3	\$505	\$46,612
Disbursements				\$-0-
Grand Total				\$46,612

18. A schedule of time charges and disbursements is annexed as Schedule A.

19. A breakdown of the time charges follows for the period follows:

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration	13.4	6,767
Claims Administration and Objections	3.9	1,970
Meeting of Creditors	4.6	2,323
Plan and Disclosure Statement	53.7	28,129
Asset Disposition	10.1	5,101
Fee & Employment Applications	4.9	2,475
Business Operations	1.7	858

**CONCLUSION**

WHEREFORE, Applicant respectfully request that the fees and disbursements be awarded in the total amount of \$46,612, and that the Debtor be authorized to pay that amount to the Applicant, less the \$14,390 post-petition retainer amounts paid, leaving a net amount to be paid of \$32,222, and that the Court grant such other, further and different relief as is just and proper.

Dated: New York, New York  
October 4, 2017

BACKENROTH FRANKEL & KRINSKY, LLP  
Attorneys for the Debtor

By: /s/ Mark Frankel  
800 Third Avenue, 11<sup>th</sup> Floor  
New York, New York 10022  
(212) 593-1100

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
In re

Chapter 11

Seacrest Equities, LLC

Case no. 16-43956

Debtor.  
-----X

**CERTIFICATE OF PROFESSIONAL**

In accordance with the **Guidelines for Fees and Disbursements for Professionals In the EASTERN District of New York Bankruptcy Cases** (the "Guidelines"), Mark Frankel, a member of the firm of Backenroth, Frankel & Krinsky, LLP, 800 Third Avenue, New York, New York 10022 (the "Applicant"), hereby certifies as follows:

1. I have read the foregoing Application for Final Allowance of Compensation and Reimbursement of Expenses by Counsel for the Debtor (the "Application").

2. To the best of my knowledge, information and belief formed after reasonable inquiry, the fees and disbursements sought fall within the Amended Guidelines and the UST Guidelines for fee applications, except as specifically noted in this certification and described in the fee application.

3. Except to the extent that fees or disbursements are prohibited by these Amended Guidelines or the UST Guidelines, the fees and disbursements sought are billed at rates and in accordance with practices customarily employed by the applicant and generally accepted by the applicant's clients.



4. In providing a reimbursable service, the applicant does not make a profit on the service, whether the service is performed by the applicant in-house or through a third party.

5. The debtor has been provided with periodic statements of fees and disbursements accrued.

6. A list of professionals and paraprofessionals providing services, their respective billing rates, the aggregate hours spent by each professional and paraprofessional, a general description of services rendered, a reasonably detailed breakdown of the disbursements incurred and an explanation of billing practices is incorporated into the attached fee application. BFK professionals and paraprofessionals providing services record their time contemporaneously on a daily basis in increments of one tenth of an hour with a description of the services formed.

7. The debtor has been provided with a copy of the relevant fee application at least 14 days before the date set by the court or any applicable rules for filing fee applications.

Dated: New York, New York  
October 4, 2017

s/ Mark Frankel

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
In re

Chapter 11

Seacrest Equities, LLC

Case no. 16-43956

Debtor.  
-----X

**ORDER GRANTING APPLICATION FOR ALLOWANCE  
OF FINAL COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Upon the application (the "Application") of Backenroth Frankel & Krinsky, LLP ("BFK"), attorneys for the Debtor, for allowance of final compensation and reimbursement of expenses for professional services rendered and expenses incurred during this Chapter 11 case, and upon the hearing held before this Court on November 15, 2017, and after due deliberation, and consideration sufficient cause appearing therefore, it is

ORDERED that the Application be, and it hereby is, granted to the extent set forth in the Schedule annexed hereto, and that the Debtor pay that amount, less the \$14,390 pre-petition retainer, leaving a net amount to be paid of \$32,222.



Case No.: 16-43956

Case Name: Seacrest Equities, LLC

**Schedule B****FINAL APPLICATION TOTALS**

September 1, 2016 through August 22, 2017

(1) Applicant	(2) Total Fees Requested	(3) Total Fees Paid	(4) Total Expenses Requested	(5) Total Expenses Paid
Backenroth Frankel & Krinsky, LLP	\$46,612	\$46,612	\$-0-	\$-0-

Revised September 2011

DATE ON WHICH ORDER WAS SIGNED:

INITIALS: \_\_\_\_\_ USBJ

MAF 9/1/2016	Completed and filed petition	1.0	\$505.00
MAF 9/1/2016	Completed and filed retention app	0.5	\$252.50
MAF 9/1/2016	Completed and filed disclosure statement	0.8	\$404.00
MAF 9/1/2016	Completed and filed local rule statement	0.9	\$454.50
MAF 9/1/2016	Completed and filed bar date app	0.3	\$151.50
MAF 9/9/2016	Drafted filed and served disclosure statement NOH	0.4	\$202.00
MAF 9/9/2016	Drafted filed and served served status conf adj (.4); email client re Ch. 11 obligations (1.0)	1.4	\$707.00
MAF 9/19/2016	Email client re IDI	0.1	\$50.50
MAF 9/29/2016	To UST on IDI	2.0	\$1,010.00
MAF 10/7/2016	Prep for and to 341 meeting	2.5	\$1,262.50
MAF 10/15/2016	Teleconference UST re retention affidavit	0.3	\$151.50
MAF 10/18/2016	Prep for 10/19 hearing on disclosure statement	0.5	\$252.50
MAF 10/19/2016	To status conf	2.5	\$1,262.50
MAF 10/21/2016	Revised and uploaded bar date order	0.5	\$252.50
MAF 10/31/2016	Revised disclosure statement plan	2.9	\$1,464.50
MAF 10/31/2016	Drafted Suppl retention affidavit	0.5	\$1,868.50
MAF 10/31/2016	Draft POC and Notice and sent to R. Jump (to serve)	0.3	\$1,868.50
MAF 11/3/2016	Completed broker retention app and sent to broker	0.5	\$252.50
MAF 11/4/2016	Teleconference client re disclosure statement (.1); revised and filed same with plan and disclosure order	2.9	\$1,464.50
MAF 11/10/2016	Teleconference client re sale of property (.1)	0.2	\$101.00
MAF 11/10/2016	Teleconference client re disclosure statement (.1)	0.2	\$101.00
MAF 11/18/2016	Teleconference client re sale	0.2	\$101.00
MAF 11/21/2016	Revised disclosure statement order (.5); drafted ballots and arranged for service (.7)	1.2	\$606.00
MAF 11/30/2016	Teleconference client re sale of property (.3); emails broker re same (.3); drafted op report (.5)	1.1	\$555.50
MAF 12/1/2016	Email client re retention and op report	0.1	\$50.50
MAF 12/7/2016	Teleconference client re plan conf and Chase	0.5	\$252.50

MAF	12/12/2016	Teleconference client re sale, op report and retention	0.2	\$101.00
MAF	12/13/2016	Completed and filed Sept., Oct. and Nov. op reports	1.5	\$757.50
MAF	12/15/2016	Email client re retention	0.1	\$50.50
MAF	12/19/2016	Served disclosure statement and ballot	0.5	\$252.50
MAF	12/19/2016	Reviewed filed and served BFK retention pleadings	0.7	\$353.50
MAF	12/22/2016	Reviewed sale contract and email client re same	0.1	\$50.50
MAF	12/27/2016	Teleconference De Luca re plan conf	0.2	\$101.00
MAF	12/28/2016	Teleconference Melissa Licker re plan conf (.1); t/c Gaffney re same (.3); t/c client re same (.1); reviewed ballots and claim obj (.7)	1.2	\$606.00
MAF	12/29/2016	Teleconference client re conf	0.1	\$50.50
MAF	12/30/2016	Teleconferences and email client re Conf. Order and settlement	0.5	\$252.50
MAF	1/3/2017	Teleconference client re confirmation issues	0.4	\$202.00
MAF	1/6/2017	Teleconference client re confirmation objection and CS&G claim	0.3	\$151.50
MAF	1/9/2017	Teleconference court re adj (.1); t/c client re same and re settlement (.2); drafted notice re same (.2); t/c UST re same (.1)	0.6	\$303.00
MAF	1/10/2017	Teleconference Gaffney re plan (.4); t/c client re same (.2)	0.6	\$303.00
MAF	1/10/2017	Emails broker re sale (.1)	0.1	\$50.50
MAF	1/20/2017	Drafted and filed supplemental retention affidavit	0.5	\$252.50
MAF	1/23/2017	Email UST re retention	0.1	\$50.50
MAF	1/24/2017	Email client re op report	0.1	\$50.50
MAF	1/31/2017	Teleconference Gaffney re settlement (.1); t/c client re same (.2)	0.3	\$151.50
MAF	2/3/2017	Email client re op report	0.1	\$50.50
MAF	2/7/2017	Teleconference court re adj (.1); email parties re same (.1); t/c client re status (.3)	0.5	\$252.50
MAF	2/7/2017	T/c broker re sale (.3)	0.3	\$404.00
MAF	2/8/2017	Prep for and to court on status conf	3.5	\$1,767.50
MAF	2/24/2017	Teleconference client re Adv. proc on Chase claim	0.4	\$202.00
MAF	3/3/2017	Teleconference client re claims obj.	0.2	\$101.00

MAF 3/9/2017	Teleconference client re settlement with Gaffney	0.2	\$101.00
MAF 3/13/2017	Teleconference Fong re sale (.1); email client re same (.1)	0.2	\$101.00
MAF 3/15/2017	Drafting conf affidavit and cert. of ballots (2.0); t/c Licker re same (.4); email Licker re same (.2)	2.6	\$1,313.00
MAF 3/16/2017	Teleconference Chase re settlement (.8); emails client re same (.1)	0.9	\$454.50
MAF 3/17/2017	Teleconference Gaffney re settlement (.4); t/c's client and Licker re Chase settlement (1.0); t/c court re same (.1); email UST re same (.1); email purchaser re status (.2)	1.8	\$909.00
MAF 3/20/2017	Teleconference Yaverbaum re sale and settlement	0.3	\$151.50
MAF 3/20/2017	Drafted filed and served adj notice (.5)	0.5	\$252.50
MAF 3/21/2017	Teleconference CSG re adj	0.2	\$101.00
MAF 3/27/2017	Teleconference client re sale and settlement with Chase	0.3	\$151.50
MAF 3/29/2017	Email broker re marketing plan	0.1	\$50.50
MAF 4/5/2017	Teleconference client re Chase appraisal and Gaffney	0.4	\$202.00
MAF 4/6/2017	Email to Chase re inspection	0.1	\$50.50
MAF 4/14/2017	Email Licker re sale	0.1	\$50.50
MAF 4/19/2017	To court on conf hearing	3.5	\$1,767.50
MAF 4/26/2017	Teleconference Chase re inspection (.1); emails client re same (.2)	0.3	\$151.50
MAF 5/10/2017	Review title report re drafting conf and affidavit	2.0	\$1,010.00
MAF 5/17/2017	Drafting conf afft and prep for conf hearing	1.0	\$505.00
MAF 5/22/2017	Revised MYC retention app and sent to UST	0.2	\$101.00
MAF 5/22/2017	Revised bidding procedures	2.8	\$1,414.00
MAF 5/25/2017	Teleconference client re settlement	0.2	\$101.00
MAF 5/28/2017	Reviewed documents re Ch.11 plan strategy (1.0); t/c client re same (.5)	1.5	\$757.50
MAF 5/30/2017	Email UST re broker retention	0.1	\$50.50
MAF 6/2/2017	Teleconference client re sale (.2); t/c Broker re marketing (.2)	0.4	\$202.00
MAF 6/2/2017	Filed and served retention application (.5)	0.5	\$252.50
MAF 6/7/2017	Revised conf affidavit (2.0); drafted conf order (1.5); t/c client re same (.3)	3.8	\$1,919.00

MAF 6/7/2017	T/c MYC re retention (.2)	0.2	\$1,868.50
MAF 6/8/2017	Teleconference Yaverbaum re MYC retention (.1); email client re same (.1)	0.2	\$101.00
MAF 6/8/2017	Revised conf afft (2.5); t/c client re settlement (.3); t/c Licker re same (.2)	3.0	\$1,515.00
MAF 6/9/2017	Teleconference court re adjournment (.1); conf call Chase re same (1.0); email parties and broker re agreement (.2)	0.3	\$151.50
MAF 6/12/2017	Teleconference Schenker re status (.3); t/c client re adj and Settlement (.4); email Chase and UST re same (.1); drafted filed and served adj notice (.6)	1.4	\$707.00
MAF 6/13/2017	Emails Chase re sale (.2); t/c MYC re same (.2)	0.4	\$202.00
MAF 6/16/2017	Email Fong re sale	0.1	\$50.50
MAF 6/23/2017	Teleconference client re credit bid procedures	0.2	\$101.00
MAF 6/29/2017	Email Fong re sale	0.1	\$50.50
MAF 7/5/2017	Reviewed and revised conf order insert (1.4); email client re same (.4); t/c client re same (.2)	2.0	\$1,010.00
MAF 7/6/2017	Teleconference client re lis pendens (.2); email Chase re same and re settlement (.5); revised conf order re same (.2)	0.9	\$454.50
MAF 7/10/2017	Revised confirmation affidavit agreement with Chase and re no agreement with Chase (5.0); emails Chase re same (.3); t/c client re same (.2); filed Yaverbaum affidavit (.2)	5.7	\$2,878.50
MAF 7/11/2017	Revised confirmation docs (1.5); t/c's client re same (.3); c/c Chase re same (.2); t/c Poon re same (.2); t/c Yaverbaum re same (.1)	2.3	\$1,161.50
MAF 7/12/2017	Prep re conf hearing (3.0); to court re same (2.5)	5.5	\$2,777.50
MAF 7/13/2017	Revised confirmation order and re circulated same	0.8	\$404.00
MAF 7/14/2017	Teleconferences and emails title co. re closing (.5); t/c client re same (.9)	1.4	\$707.00
MAF 7/27/2017	Teleconference Deluca re conf order	0.2	\$101.00
MAF 7/31/2017	Emails Fong and Title Co. re conf order	0.5	\$252.50
MAF 8/7/2017	Teleconference lender re conf order	0.1	\$50.50
MAF 8/10/2017	Teleconference Title co re conf order	0.1	\$50.50
MAF 8/11/2017	Teleconference Title co and revised conf order	1.9	\$959.50
MAF 8/15/2017	Teleconference client re conf order	0.2	\$101.00
MAF 8/16/2017	Teleconference client re conf order (.2); email title company re same (.3)	0.5	\$252.50
MAF 8/17/2017	Completed and filed conf order	1.0	\$505.00



MAF 8/22/2017	Email parties re plan conf	0.2	\$101.00
MAF 8/28/2017	Emails buyer and title company re bankruptcy court order and closing	0.2	\$101.00
MAF 9/6/2017	Emails client re closing (.4); t/c client re same (.1)	0.5	\$252.50
MAF 9/15/2017	Teleconference De Luca re status of closing	0.1	\$50.50
MAF 9/25/2017	Teleconference client re closing (.2); drafted statement re escrow (.2);	0.4	\$202.00
			<hr/>
			<b>\$46,612.00</b>
			<b>92.3</b> 46,612

**341 Meeting**

MAF	9/19/2016	Email client re IDI	0.1	\$50.50
MAF	9/29/2016	To UST on IDI	2.0	\$1,010.00
MAF	10/7/2016	Prep for and to 341 meeting	2.5	\$1,262.50
			<b>4.6</b>	<b>\$2,323.00</b>

**Asset Disposition**

MAF	11/10/2016	Teleconference client re sale of property (.1)	0.2	\$101.00
MAF	11/18/2016	Teleconference client re sale	0.2	\$101.00
MAF	11/30/2016	Teleconference client re sale of property (.3); emails broker re same (.3); drafted op report (.5)	1.1	\$555.50
MAF	12/22/2016	Reviewed sale contract and email client re same	0.1	\$50.50
MAF	1/10/2017	Emails broker re sale (.1)	0.1	\$50.50
MAF	2/7/2017	T/c broker re sale (.3)	0.3	\$151.50
MAF	3/13/2017	Teleconference Fong re sale (.1); email client re same (.1)	0.2	\$101.00
MAF	3/20/2017	Teleconference Yaverbaum re sale and settlement	0.3	\$151.50
MAF	3/29/2017	Email broker re marketing plan	0.1	\$50.50
MAF	4/6/2017	Email to Chase re inspection	0.1	\$50.50
MAF	4/14/2017	Email Licker re sale	0.1	\$50.50
MAF	4/26/2017	Teleconference Chase re inspection (.1); emails client re same (.2)	0.3	\$151.50
MAF	5/10/2017	Review title report re drafting conf and affidavit	2.0	\$1,010.00
MAF	5/22/2017	Revised bidding procedures	2.8	\$1,414.00
MAF	6/2/2017	Teleconference client re sale (.2); t/c Broker re marketing (.2)	0.4	\$202.00
MAF	6/13/2017	Emails Chase re sale (.2); t/c MYC re same (.2)	0.4	\$202.00
MAF	6/16/2017	Email Fong re sale	0.1	\$50.50
MAF	6/23/2017	Teleconference client re credit bid procedures	0.2	\$101.00
MAF	6/29/2017	Email Fong re sale	0.1	\$50.50
MAF	9/6/2017	Emails client re closing (.4); t/c client re same (.1)	0.5	\$252.50

MAF	9/15/2017	Teleconference De Luca re status of closing	0.1	\$50.50
MAF	9/25/2017	Teleconference client re closing (.2); drafted statement re escrow (.2);	0.4	\$202.00
			<b>10.1</b>	<b>\$5,100.50</b>

#### **Case Administration**

MAF	9/1/2016	Completed and filed local rule statement	0.9	\$454.50
MAF	9/9/2016	Drafted filed and served served status conf adj (.4); email client re Ch. 11 obligations (1.0)	1.4	\$707.00
MAF	10/19/2016	To status conf	2.5	\$1,262.50
MAF	12/1/2016	Email client re retention and op report	0.1	\$50.50
MAF	12/12/2016	Teleconference client re sale, op report and retention	0.2	\$101.00
MAF	12/13/2016	Completed and filed Sept., Oct. and Nov. op reports	1.5	\$757.50
MAF	1/9/2017	Teleconference court re adj (.1); t/c client re same and re settlement (.2); drafted notice re same (.2); t/c UST re same (.1)	0.6	\$303.00
MAF	2/7/2017	Teleconference court re adj (.1); email parties re same (.1); t/c client re status (.3)	0.5	\$252.50
MAF	2/8/2017	Prep for and to court on status conf	3.5	\$1,767.50
MAF	3/20/2017	Drafted filed and served adj notice (.5)	0.5	\$252.50
MAF	6/9/2017	Teleconference court re adjournment (.1); conf call Chase re same (1.0); email parties and broker re agreement (.2)	0.3	\$151.50
MAF	6/12/2017	Teleconference Schenker re status (.3); t/c client re adj and Settlement (.4); email Chase and UST re same (.1); drafted filed and served adj notice (.6)	1.4	\$707.00
			<b>13.4</b>	<b>\$6,767.00</b>

#### **Claims**

MAF	9/1/2016	Completed and filed bar date app	0.3	\$151.50
MAF	10/21/2016	Revised and uploaded bar date order	0.5	\$252.50
MAF	10/31/2016	Draft POC and Notice and sent to R. Jump (to serve)	0.3	\$151.50
MAF	2/24/2017	Teleconference client re Adv. proc on Chase claim	0.4	\$202.00
MAF	3/3/2017	Teleconference client re claims obj.	0.2	\$101.00
MAF	3/9/2017	Teleconference client re settlement with Gaffney	0.2	\$101.00
MAF	3/17/2017	Teleconference Gaffney re settlement (.4); t/c's client and Licker re Chase settlement (1.0); t/c court re same (.1); email UST re same (.1); email purchaser re status (.2)	1.8	\$909.00
MAF	3/21/2017	Teleconference CSG re adj	0.2	\$101.00

**3.9     \$1,969.50**

**Fee Application**

MAF	9/1/2016	Completed and filed retention app	0.5	\$252.50
MAF	10/15/2016	Teleconference UST re retention affidavit	0.3	\$151.50
MAF	10/31/2016	Drafted Suppl retention affidavit	0.5	\$252.50
MAF	11/3/2016	Completed broker retention and sent to broker	0.5	\$252.50
MAF	11/3/2016	Completed broker retention app and sent to broker	0.5	\$252.50
MAF	12/15/2016	Email client re retention	0.1	\$50.50
MAF	12/19/2016	Reviewed filed and served BFK retention pleadings	0.7	\$353.50
MAF	1/20/2017	Drafted and filed supplemental retention affidavit	0.5	\$252.50
MAF	1/23/2017	Email UST re retention	0.1	\$50.50
MAF	5/22/2017	Revised MYC retention app and sent to UST	0.2	\$101.00
MAF	5/30/2017	Email UST re broker retention	0.1	\$50.50

MAF	6/2/2017	Filed and served retention application (.5)	0.5	\$252.50
MAF	6/7/2017	T/c MYC re retention (.2)	0.2	\$101.00
<b>MAF</b>	6/8/2017	Teleconference Yaverbaum re MYC retention (.1); email client re same (.1)	0.2	\$101.00
			<b>4.9</b>	<b>\$2,474.50</b>

**Business Operations**

MAF	9/1/2016	Completed and filed petition	1.0	\$505.00
MAF	12/7/2016	Teleconference client re plan conf and Chase	0.5	\$252.50
MAF	1/24/2017	Email client re op report	0.1	\$50.50
MAF	2/3/2017	Email client re op report	0.1	\$50.50
			<b>1.7</b>	<b>\$858.50</b>

**Plan**

MAF	9/1/2016	Completed and filed disclosure statement	0.8	\$404.00
MAF	9/9/2016	Drafted filed and served disclosure statement NOH	0.4	\$202.00
MAF	10/18/2016	Prep for 10/19 hearing on disclosure statement	0.5	\$252.50
MAF	10/31/2016	Revised disclosure statement plan	2.9	\$1,464.50
MAF	11/4/2016	Teleconference client re disclosure statement (.1); revised and filed same with plan and disclosure order	2.9	\$1,464.50
MAF	11/10/2016	Teleconference client re disclosure statement (.1)	0.2	\$101.00
MAF	11/21/2016	Revised disclosure statement order (.5); drafted ballots and arranged for service (.7)	1.2	\$606.00
MAF	12/19/2016	Served disclosure statement and ballot	0.5	\$252.50
MAF	12/27/2016	Teleconference De Luca re plan conf	0.2	\$101.00
MAF	12/28/2016	Teleconference Melissa Licker re plan conf (.1); t/c Gaffney re same (.3); t/c client re same (.1); reviewed ballots and claim obj (.7)	1.2	\$606.00
MAF	12/29/2016	Teleconference client re conf	0.1	\$50.50
MAF	12/30/2016	Teleconferences and email client re Conf. Order and settlement	0.5	\$252.50
MAF	1/3/2017	Teleconference client re confirmation issues	0.4	\$202.00
MAF	1/6/2017	Teleconference client re confirmation objection and CS&G claim	0.3	\$151.50
MAF	1/10/2017	Teleconference Gaffney re plan (.4); t/c client re same (.2)	0.6	\$303.00
MAF	1/31/2017	Teleconference Gaffney re settlement (.1); t/c client re same (.2)	0.3	\$151.50
MAF	3/15/2017	Drafting conf affidavit and cert. of ballots (2.0); t/c Licker re same (.4); email Licker re same (.2)	2.6	\$1,313.00

MAF	3/16/2017	Teleconference Chase re settlement (.8); emails client re same (.1)	0.9	\$454.50
MAF	3/27/2017	Teleconference client re sale and settlement with Chase	0.3	\$151.50
MAF	4/5/2017	Teleconference client re Chase appraisal and Gaffney	0.4	\$202.00
MAF	4/19/2017	To court on conf hearing	3.5	\$1,767.50
MAF	5/17/2017	Drafting conf afft and prep for conf hearing	1.0	\$505.00
MAF	5/25/2017	Teleconference client re settlement	0.2	\$101.00
MAF	5/28/2017	Reviewed documents re Ch.11 plan strategy (1.0); t/c client re same (.5)	1.5	\$757.50
MAF	6/7/2017	Revised conf affidavit (2.0); drafted conf order (1.5); t/c client re same (.3)	3.8	\$1,919.00
MAF	6/8/2017	Revised conf afft (2.5); t/c client re settlement (.3); t/c Licker re same (.2)	3.0	\$1,515.00
MAF	7/5/2017	Reviewed and revised conf order insert (1.4); email client re same (.4); t/c client re same (.2)	2.0	\$1,010.00
MAF	7/6/2017	Teleconference client re lis pendens (.2); email Chase re same and re settlement (.5); revised conf order re same (.2)	0.9	\$454.50
MAF	7/10/2017	Revised confirmation affidavit agreement with Chase and re no agreement with Chase (5.0); emails Chase re same (.3); t/c client re same (.2); filed Yaverbaum affidavit (.2)	5.7	\$2,878.50
MAF	7/11/2017	Revised confirmation docs (1.5); t/c's client re same (.3); c/c Chase re same (.2); t/c Poon re same (.2); t/c Yaverbaum re same (.1)	2.3	\$1,161.50
MAF	7/12/2017	Prep re conf hearing (3.0); to court re same (2.5)	5.5	\$2,777.50
MAF	7/13/2017	Revised confirmation order and re circulated same	0.8	\$404.00
MAF	7/14/2017	Teleconferences and emails title co. re closing (.5); t/c client re same (.9)	1.4	\$707.00
MAF	7/27/2017	Teleconference Deluca re conf order	0.2	\$101.00
MAF	7/31/2017	Emails Fong and Title Co. re conf order	0.5	\$252.50
MAF	8/7/2017	Teleconference lender re conf order	0.1	\$50.50
MAF	8/10/2017	Teleconference Title co re conf order	0.1	\$50.50
MAF	8/11/2017	Teleconference Title co and revised conf order	1.9	\$959.50
MAF	8/15/2017	Teleconference client re conf order	0.2	\$101.00
MAF	8/16/2017	Teleconference client re conf order (.2); email title company re same (.3)	0.5	\$252.50
MAF	8/17/2017	Completed and filed conf order	1.0	\$505.00

;

MAF	8/22/2017	Email parties re plan conf	0.2	\$101.00
MAF	8/28/2017	Emails buyer and title company re bankruptcy court order and closing	0.2	\$101.00
MAF			<b>53.7</b>	<b>\$28,128.50</b>
MAF				
MAF			<b>Total Hours</b>	<b>92.3</b>
MAF			<b>Total Fee</b>	<b>\$46,612.00</b>
MAF				
MAF				